



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

SK
F.#2017R01829

*271 Cadman Plaza East
Brooklyn, New York 11201*

September 17, 2018

By Email and ECF

Michael L. Brown II, Esq.
Federal Defenders of New York
One Pierrepont Plaza, 16th Floor
Brooklyn, NY 11201

Re: United States v. Abdul Rasheed Yahaya
Criminal Docket No. 18-121 (JBW)

Dear Mr. Brown:

Pursuant to Federal Rule of Criminal Procedure 16(a)(1)(G), the government hereby provides notice of the following expert witnesses that the government may call in its case-in-chief at trial. The government also hereby requests reciprocal discovery, pursuant to Rule 16(b)(1)(C), regarding any expert witness that the defendant intends to call at trial.

At present, the government intends to call:

- Luis Cruz: Mr. Cruz is a computer scientist with the Federal Bureau of Investigation. A copy of his resume is attached (3500-LC-1). At trial, the government expects that Mr. Cruz will testify about his examination and review of a victim email account and computer (screenshots and excerpts of which were previously produced as ARY-002313). A copy of Mr. Cruz's report documenting his findings is attached (3500-LC-2).

In addition, the government expects to call these additional expert witnesses, whose identities, qualifications, and bases for conclusions will be provided to you when they become available:

- Business email compromise expert: The government expects to call an individual with relevant academic and professional training and experience to testify about the manner and means by which an email

account can be compromised, including through spear phishing, identity theft, spoofing of emails and websites, and the use of malware.

- Electronic devices forensic expert: The government expects to call an individual with relevant academic and professional training and experience to testify about the forensic examination of a co-conspirator's cellphone (previously produced at ARY-002540).

The government reserves the right to call additional and/or substitute expert witnesses. Please contact us if you have any questions or requests.

Very truly yours,

RICHARD P. DONOGHUE
United States Attorney

By: /s/
Saritha Komatireddy
Sarah Evans
Assistant U.S. Attorneys
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Enclosures

cc: Clerk of the Court (JBW) (by ECF) (without enclosures)